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1 MICHAEL M. EDWARDS, ESO. Nevada Bar No. 6281 2 NICHOLAS L. HAMILTON, ESO. Nevada Bar No. 10893 3 MESSNER REEVES LLP 8945 W. Russell Road, Suite 300 4 Las Vegas, Nevada 89148 Telephone: 5 (702) 363-5100 Facsimile: (702) 363-5101 6 medwards@messner.com nhamilton@messner.com Attorneys for Defendant Winnebago Industries, Inc. 8 9 UNITED STATES DISTRICT COURT 10 DISTRICT OF NEVADA 11 GORDON WOOD, an Individual, Case No.: 2:18-cv-01710-JCM-PAL 12 Plaintiff, STIPULATION AND ORDER TO 13 v. CONTINUE DISCOVERY 14 WINNEBAGO INDUSTRIES, INC., [SECOND REQUEST] 15 Defendant. 16 Plaintiff GORDON WOOD and Defendant WINNEBAGO INDUSTRIES, INC., by and 17 through their counsel of record, hereby stipulate and agree to the following: 18 1. In light of the litigation schedules of all counsel in this litigation, the parties require 19 additional time to conduct necessary discovery, including Defendant's expert inspection for the 20 Plaintiff's vehicle recreational vehicle that is the subject of this litigation and needed depositions. 21 Additionally, the deposition of Defendant's Fed. R. Civ. 30(b)(6) designee, Steven Mary, has been 22 complicated by the extended medical leave of Defendant's preferred witness. 23 2. Counsel for the parties have conferred and have ascertained mutually convenient dates 24 and times for the following activities: 25 February 26, 2019: Inspection of Plaintiff's subject vehicle, at 5455 S. Valley View, 26 Las Vegas, Nevada, starting at 9:00 am: 27 28

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March 4, 2019, deposition of 30(b)(6) representative of Giant Rv, at 9150 Benson Ave., Montclair, CA starting at 1:30 pm;

- March 4, 2019: deposition of Giant Rv Service Manager, starting at 3:30 pm;
- April 2, 2019: deposition of Defendant's 30(b)(6) representative, in Forest City, Iowa beginning at 9:00 am. Should Mr. Mary not be available to testify, Defendants shall produce another suitable person available to testify at this date, time and location.
- 3. The parties anticipate taking expert depositions in April.
- To accommodate the foregoing activities, the parties request the following revisions to 4. the governing discovery scheduling order:

	Existing Discovery Deadline:	Requested Discovery Deadline:
Expert Disclosures	February 11, 2019	March 11, 2019
Discovery Cutoff	March 12, 2019	May 24, 2019

- 5. This stipulation is not sought for purpose of delay, but to facilitate the fair resolution of this matter while avoiding any undue expenditure of resources in the interim.
- 6. The undersigned counsel are available to conduct a conference with the Magistrate to discuss this request further.

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	7. For the foregoing reasons, the parties respectfully request that this Stipulation to
	2 Continue Discovery be granted.
	DATED: 2/7/19 DATED: 13/19
	BALLED. A SHOPE
	Du All Makes (Tens 1/2)
•	Michael Edwards. Esq. George O. West NI
(Nevada Bar No. 6281 Law Office of George O. West, III
, .	Consumer Attorneys Against Auto Fraud
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	Attorneys for Defendant Burdoe Law Office Co. LDA
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12	Dayton, Ohio 45458-1850
13	Telephone: (937) 432-9500 Facsimile: (937) 432-9503
	Attorneys for Plaintiff Gordon Wood
14	
15	ORDER
16	IT IS SO ORDERED.
17	IT IS FURTHER ORDERED that no further extensions will be allowed.
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40	Dated: February 13, 2019
18	Dated: February 13, 2019
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	Dated: February 13, 2019 UNITED STATES MAGISTRATE JUDGE
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